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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

KEN-WEN FAMILY LIMITED PARTNERSHIP;  
KENNETH W. BROWN, in his capacity as a  
General Partner of the Ken-Wen Family Limited  
Partnership; and WENDY BROWN,

Defendants.

Adv. Pro. No. 10-04468 (SMB)

**FOURTH CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE that on October 28, 2015, pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above-captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, a Case Management Notice (the “First Case Management Notice”) was filed in the above-captioned adversary proceeding (the “Adversary Proceeding”).

PLEASE TAKE FURTHER NOTICE that, on January 13, 2016, an amended Case Management Notice (the “Second Case Management Notice”) was filed in the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that, on May 4, 2017, an amended Case Management Notice (the “Third Case Management Notice”) was filed in the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order, the parties to the Adversary Proceeding, by and through their counsel, have agreed to an amendment to the dates set forth in the Third Case Management Notice and that the following deadlines are hereby made applicable to the Adversary Proceeding:

1. Fact Discovery shall be completed by: March 5, 2018
2. The Disclosure of Case-in-Chief Experts shall be due: June 25, 2018
3. The Disclosure of Rebuttal Experts shall be due: July 26, 2018
4. The Deadline for Completion of Expert Discovery shall be: August 27, 2018
5. The Deadline for Service of a Notice of Mediation Referral shall be: On or before September 3, 2018.
6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before September 16, 2018.

7. The Deadline for Conclusion of Mediation shall be: On or before January 14, 2019.

The parties to the Adversary Proceeding acknowledge that, on September 25, 2017, Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC (the “Trustee”) filed a motion for leave (the “Motion”) to amend the Complaint dated November 12, 2010, and agree that all deadlines set forth herein will be stayed pending disposition of the Motion. To the extent necessary, upon the Court’s decision on the Motion, the parties will negotiate an amended Case Management Order.

Dated: October 18, 2017

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

By: /s/ Matthew B. Lunn  
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